

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

RUDOLPH W. GUILIANI
a/k/a RUDOLPH WILLIAM GUILIANI

Case No. 23-12055

Debtor.

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MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Matthew D. Cavanaugh, request admission, *pro hac vice*, before the Honorable Sean H. Lane, to represent Herring Networks, Inc. d/b/a One America News Network, Charles Herring, Robert Herring, Sr., and Chanel Rion, parties-in-interest in the above-referenced ☒ case ☐ adversary proceeding.

I certify that I am a member in good standing of the bar in the State of Texas and the bar of the U.S. District Court for the Southern District of Texas.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: January 12, 2024.

Houston, Texas

/s/ Matthew D. Cavanaugh

Matthew D. Cavanaugh

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